

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,)	CASE NO. 3:18-CR-00032-TMR-2
)	
Plaintiff,)	
)	HONORABLE THOMAS M. ROSE
-vs-)	
)	
TAWNNEY M. CALDWELL,)	
)	
Defendant.)	

**MOTION TO FILE DOCUMENTS RELATED TO REQUESTED JAIL VISITS WITH DEFENDANT
*EX PARTE AND UNDER SEAL***

Now comes the defendant, Tawnney M. Caldwell, by and through undersigned counsel, and respectfully moves this Court for an order authorizing the defense to file documents related to requested jail visits with defendant *ex parte* and under seal.

Ms. Caldwell is an indigent defendant charged with Capital Murder. As such, she has been appointed counsel and granted the ability – pursuant to the various rules and regulations promulgated by the Sixth Circuit – to employ experts that are vital to her defense. Those experts will need to visit with the defendant in jail.

As such, Ms. Caldwell prays this Honorable Court issue an order, authorizing her counsel to file documents related to requested jail visits *ex parte* and under seal.

Respectfully submitted,

S/Jon Paul Rion

Jon Paul Rion (OH 0067020)
Rion, Rion & Rion, L.P.A., INC.
130 West Second Street, Suite 2150
PO Box 10126, Suite 2150
(937) 223-9133
(937) 223-7540 (fax)
Info@RionLaw.com

S/ David L. Doughten

David L. Doughten (OH 0002847)
4403 St. Clair Ave.
Cleveland, OH 44103
(216) 361-1112
(216) 881-3928 Fax
ddoughten@yahoo.com

ATTORNEYS FOR DEFENDANT TAWNNEY C. CALDWELL

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2019, a true copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

S/Jon Paul Rion
JON PAUL RION

Counsel for Defendant Caldwell